

REMARKS/ARGUMENTS

Claims 1, 5 – 7, 9 – 15, 20, 22, 23, 25, 28, and 29 were previously pending. No claims have been amended, canceled, or added. Thus, claims 1, 5 – 7, 9 – 15, 20, 22, 23, 25, 28, and 29 remain pending.

Applicants respectfully request reconsideration of this application based on the following remarks.

Preliminary Matters

Applicants note once again that several deficiencies in the cited references were explained to the Examiner in the previously filed responses. However, the Examiner has not specifically addressed any of Applicants' previous remarks. Applicants would like to direct the Examiner to MPEP § 707.07(f) which recites that where **"the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it."** Accordingly, if the Examiner wishes to again maintain these rejections, Applicants respectfully request that the Examiner address the substance of Applicants arguments, as is required by the MPEP, in any future Office Actions.

Claim Rejections – 35 USC § 103

Claims 1, 5, 6, 20, 22, and 28 are rejected under 35 USC § 103(a) as being obvious over Madour (US Patent Application Publication No. 2003/0053431, "Madour I") in view of Bertrand (US Patent No. 6,876,640). Claims 7, 9 – 15, 23, 25, and 29 are rejected under 35 USC § 103(a) as being obvious over Bertrand in view of Madour (US Patent No. 6,834,050, "Madour II"). Applicants respectfully traverse these rejections.

Independent Claims 1, 20, and 28

Claim 1 recites, among other things, a wireless communication device, comprising a connection table for storing one or more connection identifiers, wherein a connection identifier corresponds to a Packet Coordination Function (PCF) that has been previously visited by the wireless communication device, the connection table indicating whether a connection between the wireless communication device and each PCF is active; a processor for determining if a received connection identifier is contained in the connection table, and for delivering the received

connection identifier to the connection table for storing when the received connection identifier is not contained in the connection table; and a corresponding timer, wherein the processor removes the connection identifier from the connection table in response to an expiration of the corresponding timer. Thus, the wireless communication device itself maintains timers which are used to determine whether to remove an entry from its connection table, the entries corresponding to previously visited PCFS. Independent claims 20 and 28 include similar features. At least this combination of features is not disclosed or even suggested by Madour I or Bertrand, alone or in combination with each other.

Madour I is concerned with intra-PDSN handoffs. That is, Madour I deals with handoffs from one PCF to another, both PCFs communicating with the same PDSN. The Examiner correctly acknowledges that Madour I fails to disclose "a corresponding timer, wherein the processor removes a connection from the connection table in response to an expiration of the corresponding timer; and wherein the processor resets the corresponding timer in response to activity on a connection corresponding to the connection identifier." The Examiner relies on Bertrand to overcome this deficiency.

Bertrand, in contrast to Madour I, is concerned with inter-PDSN handoffs. That is, Bertrand deals with handoffs from one PDSN to a different PDSN. Bertrand does not disclose or even suggest a wireless communication device which maintains a timer used to determine whether a connection identifier should be removed from a connection table (the connection table also included on the wireless device). Rather, as previously explained, it is only the PPP registers 126, in Bertrand, which maintain a timer. As described in column 8, line 60 – column 9, line 5, R-P connections (e.g., the connection between an RN 108 and a PDSN 120) must be periodically re-registered. When an RN 108 sends a re-registration message to a PDSN 120, the PDSN 120 refreshes a PPP register 126 so that the PPP register does not timeout. The PPP register then updates its expiration timer. If a PPP register does not hear from a PDSN on behalf of a mobile station within a predetermined amount of time, the expiration timer expires and the PPP register removes the stored PPP context for the mobile station from its database. Thus, as clear explained in Bertrand, it is the PPP register, and not a wireless communication device (which, at best, would correspond to mobile station 102 of Bertrand) that maintains a timer (and its corresponding connection table). Thus, the combination of Bertrand and Madour I fails to disclose each and every element of the pending claims because neither reference discloses or

even suggests at least a timer being maintained by a wireless communication device.

Moreover, the Examiner asserts that it would "have been obvious to one of the ordinary skill in the art to combine the teaching of Bertrand with the system of Madour for the benefit of achieving a system that reduces radio resource by preventing the creation and renegotiation of PPP session whenever mobile station moves different PDSN." The Examiner cites column 3, lines 20 – 30 of Bertrand for providing this alleged motivation. However, this passage (and Bertrand in general) are directed to inter-PDSN handovers and re-negotiating a PPP connection when moving from one PDSN to another. In contrast, Madour I is concerned with intra-PDSN transfers between PCFs, wherein a PPP connection is maintained even if the connection from the PCF to the PDSN is dormant (see, e.g., Figure 1). Thus, the issue of renegotiating a PPP session is not relevant and would not have motivated one of ordinary skill in the art to combine these references.

Independent Claims 7, 23, and 29

Independent claim 7 recites, among other things, a Packet Data Serving Node (PDSN) comprising a connection table for storing a plurality of connection sets, each connection set comprising one or more connections associated with a wireless communication device, wherein a first timer in the PDSN and a second timer associated with the wireless communication device correspond to each of the connections and wherein the first timer is set to expire after the second timer, and a buffer for receiving data from the network that is designated for delivery to a wireless communication device, storing the received data until the wireless communication device is located, based on an active connection, on one of the connections in the connection set. Independent claims 23 and 29 include similar features. Neither Bertrand nor Madour II, alone or in combination with each other, disclose at least this combination of features.

As explained in the previous response, the claim recites a first timer in the PDSN and a second timer associated with the wireless device (handset). The Examiner admits that Bertrand does not disclose "a first timer in the PDSN and a second timer in the wireless communication device" corresponding to each of the connections wherein the first timer is set to expire after the second timer, and relies on Madour II to overcome this deficiency. As clearly depicted in Figure 2, a cache timer 49 is depicted within PCF 42. Thus, cache timer 49 cannot correspond to the first timer nor the second timer recited in the pending claims because, as recited in the claims, the first timer is in the PDSN and the second timer is in the wireless communication device.

Cache timer 49 is clearly included in the PCF, which is distinct from mobile subscribers (11, 12, and 13) and PDSNs (18, 19, and 20) of Madour II. None of the other Figures depict any additional timers. However, Madour II does make mention of an R-P timer. Madour II recites, in column 4, lines 43 – 48, that after “initial PDSN selection and the handoff, a cache memory in the original PCF retains the IP address of the PDSN as well as the Mobile Station Identification (MSID) of the MN for a predetermined time period following timeout of the PPP session (i.e., following expiration of the R-P timer).” Madour II does not explicitly indicate which element maintains the R-P timer. Nonetheless, even if it was located in either a mobile station or a PDSN, Madour II would still fail to disclose both a first timer and a second timer located in a PDSN and a wireless terminal, respectively. It is unclear how the Examiner has interpreted Madour II as describing a first timer in the PDSN and a second timer in a wireless communication device, as no such description appears to be provided in any portion of Madour II. If the Examiner insists on maintaining this rejection, Applicants respectfully request that the Examiner explicitly explain what is being considered a first timer in the PDSN and a second timer in the wireless communication device so that the Applicants can prepare a proper response.

Moreover, neither Bertrand nor Madour II, alone or in combination with each other discloses a buffer for receiving data from the network that is designated for delivery to a wireless communication device, storing the received data until the wireless communication device is located, based on an active connection, on one of the connections in the connection set. As such, the combination of Bertrand and Madour II fails to disclose or suggest each and every feature of claim 7, and also fails to disclose the features of claims 23 and 29, which include similar recitations.

Dependent Claims

Claims 5, 6, 9 – 15, 22, and 25 depend from one of the independent claims. As such, these claims are also patentable over the cited references at least by virtue of their dependence, as well as the additional features each claim recites.

For example, claim 5 recites “wherein the processor clears the connection table when a connection is received corresponding to a Packet Data Serving Node (PDSN) that is different from a PDSN corresponding to a previously stored connection.” Claim 6 recites “wherein the processor clears the connection table when a clear table message is received by the receiver.” Claim 22 recites “receiving a clear table message; and clearing the connection table in response

to the clear table message.” The Examiner cites paragraphs 32, 34, and 37 of Madour I as allegedly disclosing these features. However, no portion of Madour I discloses receiving a connection corresponding to a different PDSN. Rather, Madour I is concerned with intra-PDSN transfers. Moreover, there is no disclosure or suggestion of clearing a connection table upon receipt of a clear table message. At best, Madour I discloses removing an older PZID previously stored in a list of PZIDs to make room for a new entry using a first in first out procedures. This is clearly different than clearly the list of PZIDs.

The cited references also fail to disclose each and every feature of the remaining independent claims.

Therefore, based on the foregoing, Applicants respectfully request that the Examiner withdraw the rejection of claims , 5 – 7, 9 – 15, 20, 22, 23, 25, 28, and 29 under 35 USC § 103(a).

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CONCLUSION

In light of these remarks, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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